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State of Utah

DEPARTMENT OF NATURAL RESOURCES

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Division of Oil, Gas and Mining

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Division Director

May 17, 2016

John Spencer
Simplot Phosphates, LLC
9401 North Highway 191
Vernal, Utah 84078-7802

Subject: Initial Review of Slope Stability Analysis Amendment, Simplot Phosphates LLC, Vernal Phosphate Mine, M/047/0007, Uintah County, Utah

Dear Mr. Spencer:

Thank you for submitting the Slope Stability Analysis report received on April 14, 2016. Please review and address the attached comments which are listed under the applicable Minerals Rule heading.

Please contact Leslie Heppler at 801-538-5257 if you have questions about the review. Thank you for your cooperation in completing this permitting action.

Sincerely,

Paul B. Baker
Minerals Program Manager

PBB: aa: eb

Attachment: Review

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INITIAL REVIEW OF NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

Simplot Phosphates, LLC
Vernal Phosphate Mine
M/047/0007
May 17, 2016

General Comments:

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
1	GTR	The study was limited to a seven-year study. Please commit in the NOI to update the analysis in seven years, or when the geomechanical properties of the rock, the geologic structural features, characteristics of the rock mass or the phreatic surface vary from the parameters used in the analysis.	lah	
2	GTR	For concurrent reclamation purposes, based on study (Table 3-2), are there any geologic units that the consultant would recommend for slope-diversity at the mine site, such as the Lower cliff for microclimates, biodiversity and aesthetics enhancement?	lah	

R647-4-109 - Impact Assessment

109.4 – Projected impacts on slope stability, erosion control, air quality, public health and safety

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
3	GTR page 1-1	Please refer to the Highwall Slope Stability Analysis in the text body of the NOI. In addition the recommendations on page 1-1 GTR need to match the text and figures of the NOI, specifically number 1, 4 and 11. Specifically maximum slope height, dips in excess of 13 degrees and backfilling the toe area.	lah	
4	GTR - All figures	Print all maps, and drill hole graphic, drill hole chart at 11"x17" (lab charts and graphs are okay as printed). It is recommended that core logs be darker.	lah	
5	GTR Page after 3-2	In Table 3-1 Please include the datum used; add adjacent to the collar coordinates.	lah	

109.5 - Actions to mitigate any impacts

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
6	GTR Sec 2.2 & Sec 6.1	Please address ground vibration and airblast limits, specifically to minimize impacts. The NOI could include verbiage on night and evening, initial, and ongoing monitoring (mentioned in 6.3), etc. In recent history the known impacts have been with a low cloud ceiling and an impact to a drainage regarding item such as spacing or burden.	lah	